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GEORGE R. GOLTZER  
(OF COUNSEL)

July 12, 2018

ECF

Honorable Ramon E. Reyes  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Brown v. City of New York, et al.*  
No. 15 Civ.4488 (KAM)(RER)

Dear Judge Reyes:

I write on behalf of all parties to request another settlement conference in the above-captioned matter.

As I assume Your Honor is aware, on June 28, 2018, Judge Matsumoto denied Defendants' motion to vacate Your Honor's order granting Plaintiff monetary and other sanctions against Defendants for their discovery violation. Defendants have 30 days to re-take Plaintiff's deposition. Meanwhile, Plaintiff is preparing what will be a substantial fee application for fees and costs related to the defense of Plaintiff's original deposition, Plaintiff's initial sanctions application, and the Defendants' motion to vacate the original sanctions order. Given these events, and before the parties gear up for trial, all parties agree that it makes sense to make another attempt at resolving this case by way of settlement.

The parties would be available on any of the following dates: August 1, 6, 7, 8, 13, 14 and 15.

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The parties have further agreed that Plaintiff will first send his demand for fees and costs, as authorized by the sanctions decisions, to the Defendants to see if the parties can resolve the issue by consent. If that doesn't work, Plaintiff will submit a formal application to the Court. Although I'm not aware of any deadline for submission of such a formal application, Defendants have agreed to waive any deadline that might apply and to consent to Plaintiff submitting a formal application within a reasonable time after Plaintiff's counsel make a judgment that settlement of the fee issue will not be possible.

Respectfully submitted,

/s/

Joel B. Rudin

JBR/ps

cc: Melanie Speight, Esq. (by ECF)  
Assistant Corporation Counsel

Amy Rameau, Esq. (by ECF)  
Co-Counsel for Plaintiff